

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**GEORGE BOYD, *et al.*,
Individually and on behalf of
all others similarly situated**

Plaintiffs,

v.

**LAW OFFICES OF
SHAPIRO, BROWN & ALT, LLP,
f/k/a Law Offices of Shapiro &
& Burson, LLP, *et al.*,**

Defendants.

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Civil Action No: 3:12-cv-700

DEFENDANTS' MOTION TO TRANSFER VENUE AND TO CONSOLIDATE

Defendants Shapiro, Brown & Alt, LLP (“SBA”) and Professional Foreclosure Corporation of Virginia (“PFC”) (collectively, “Defendants”), by counsel and pursuant to 28 U.S.C. §1406, and Federal Rule of Civil Procedure 42(a), submit their motion to transfer this case to Judge Allen in the Norfolk Division of this Court and to consolidate this case with *Moore et al. v. Shapiro & Burson, LLP*, Civil Action No. 4:11-cv-122 (“*Moore*”), for pretrial and settlement purposes.

WHEREFORE, for the reasons sets forth in their accompanying memorandum, Shapiro, Brown & Alt, LLP and Professional Foreclosure Corporation of Virginia respectfully request that the Complaint be transferred to Judge Allen in the Norfolk Division, consolidated with *Moore* for pretrial and settlement purposes, and for such other relief as may be just and proper.

Dated: December 24, 2012

Respectfully Submitted,

**Shapiro & Burson, LLP, Shapiro,
Brown & Alt, LLP, and Professional
Foreclosure Corporation of Virginia**

By: /s/ John C. Lynch
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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of December, 2012, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to the following:

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